

SEALED

FILED

MAY 21 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Heidi D. Campbell, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

LUIS GERARDO TREJO-
ZAMBRANO,
a/k/a "Goon,"
LUIS ANTONIO SORIA,
a/k/a "Sosa,"
BRYAN ULYSSES MARTINEZ,
a/k/a "Poloh,"
DARMEL DASHUN BATEMON
JR.,
a/k/a "Darmel Bateman,"
MARCOS ZAMBRANO-RIVERA
JR.,
a/k/a "Grifo,"
a/k/a "Marcos Junior Zambrano-
Rivera"
KALOB NATHANIEL BURTON,
CHRISTOPHER YAHIR
MARTINEZ,
a/k/a "Migo,"
CHRISTOPHER SABB,
a/k/a "Pressure,"
a/k/a "Pressure Pack,"

Defendants.

Case No. 24-CR-45-GKF

FILED UNDER SEAL

SECOND SUPERSEDING
INDICTMENT

[COUNTS ONE and THREE: 18
U.S.C. §§ 933(a)(3) and 933(b) –
Conspiracy and Attempt to Traffic
Firearms;
COUNT TWO: 18 U.S.C.
§ 1201(a)(1) – Kidnapping;
COUNTS FOUR, NINE, and TEN:
18 U.S.C. §§ 922(g)(1) and 924(a)(8)
– Felon in Possession of a Firearm
and Ammunition;
COUNT FIVE: 26 U.S.C.
§§ 5861(d) and 5871 – Possession of
an Unregistered Silencer;
COUNT SIX: 18 U.S.C.
§§ 922(n) and 924(a)(1)(D) – Receipt
of a Firearm While Under
Indictment for a Felony;
COUNTS SEVEN and EIGHT: 18
U.S.C. §§ 922(n) and 924(a)(1)(D) –
Transporting Firearms in Interstate
Commerce While Under
Indictment;
COUNT ELEVEN: 18 U.S.C.
§ 1952(a)(2) – Interstate Travel in
Aid of Racketeering Enterprises;
Forfeiture Allegation: 18 U.S.C.
§§ 924(d)(1), 934(a)(1)(A) and
981(a)(1)(C), 26 U.S.C. § 5872, and
28 U.S.C. § 2461(c) – Forfeiture]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. §§ 933(a)(3) and 933(b)]

On or about September 10, 2023, in the Northern District of Oklahoma and elsewhere, the defendants, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” **LUIS ANTONIO SORIA**, a/k/a “Sosa,” and **BRYAN ULYSSES MARTINEZ**, a/k/a “Poloh,” together with others known and unknown to the Grand Jury, knowingly conspired and attempted to ship, transport, transfer, cause to be transported, and otherwise dispose of one or more firearms to another person in and affecting interstate commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony.

All in violation of Title 18, United States Code, Sections 933(a)(3) and 933(b).

COUNT TWO
[18 U.S.C. § 1201(a)(1)]

On or about September 10, 2023, in the Northern District of Oklahoma, the defendants, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” **LUIS ANTONIO SORIA**, a/k/a “Sosa,” **BRYAN ULYSSES MARTINEZ**, a/k/a “Poloh,” and **MARCOS ZAMBRANO-RIVERA JR.**, a/k/a “Grifo,” a/k/a “Marcos Junior Zambrano-Rivera,” knowingly and unlawfully seized, confined, inveigled, kidnapped, abducted, carried away, and held for ransom and reward, and otherwise, E.D., a person known to the Grand Jury, and used the mail and any means, facility, and instrumentality of interstate and foreign commerce in committing and in furtherance of the commission of the offense.

All in violation of Title 18, United States Code, Section 1201(a)(1).

COUNT THREE
[18 U.S.C. §§ 933(a)(3) and 933(b)]

From on or about September 15, 2023, through on or about September 16, 2023, in the Northern District of Oklahoma and elsewhere, the defendants, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” **DARMEL DASHUN BATEMON, JR.**, a/k/a “Darmel Bateman,” **KALOB NATHANIEL BURTON**, **CHRISTOPHER YAHIR MARTINEZ**, a/k/a “Migo,” and **CHRISTOPHER SABB**, a/k/a “Pressure,” a/k/a “Pressure Pack,” together with others known and unknown to the Grand Jury, knowingly conspired and attempted to ship, transport, transfer, cause to be transported, and otherwise dispose of one or more firearms to another person in and affecting interstate commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony.

All in violation of Title 18, United States Code, Sections 933(a)(3) and 933(b).

COUNT FOUR
[18 U.S.C. §§ 922(g)(1) and 924(a)(8)]

On or about September 16, 2023, in the Northern District of Oklahoma, the defendant, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” knowing he had previously been convicted of the following crime punishable by imprisonment for a term exceeding one year:

Possession of Drug Paraphernalia (Cocaine), Case No. CR-2022-01012, in the District Court of Coconino County, State of Arizona, on August 28, 2023, knowingly possessed in and affecting interstate commerce the following firearms and ammunition:

1. A Palmetto State Armory, Dagger Compact, 19 x 9mm pistol, serial number JJE37863;
2. A Romarm/Cugir, Micro Draco, 7.62 x 39mm pistol, serial number PMD-18291-20; and
3. Assorted rounds of ammunition.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT FIVE
[26 U.S.C. §§ 5861(d) and 5871]

From on or about September 15, 2023, through on or about September 16, 2023, in the Northern District of Oklahoma, the defendant, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” knowingly possessed a firearm, that is, a silencer which was not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Sections 5861(d) and 5871.

COUNT SIX
[18 U.S.C. §§ 922(n) and 924(a)(1)(D)]

On or about September 16, 2023, in the Northern District of Oklahoma, the defendant, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” knowing he was then under indictment for at least one of the following crimes punishable by imprisonment for terms exceeding one year:

1. Simultaneous Possession of Drugs and Firearms (Count One), Case No 04CR-22-1564, in the District Court of Benton County, State of Arkansas;
2. Possession of Marijuana with Purpose to Deliver (Count Two), Case No 04CR-22-1564, in the District Court of Benton County, State of Arkansas;
3. Fleeing- Felony Vehicle or Conveyance- Substantial Danger of Death (Count Three), Case No 04CR-22-1564, in the District Court of Benton County, State of Arkansas;
4. Possession with Purpose to Deliver Methamphetamine, Cocaine, or Heroin (Count Four), Case No 04CR-22-1564, in the District Court of Benton County, State of Arkansas;
5. Simultaneous Possession of Drugs and Firearms (Count One), Case No. 72CR-23-321, in the District Court of Washington County, State of Arkansas;
6. Possession of Controlled Substance- Meth or Cocaine (Count Two), Case No. 72CR-23-321, in the District Court of Washington County, State of Arkansas;
7. Theft by Receiving Firearm Under \$2,500 (Count Three), Case No. 72CR-23-321, in the District Court of Washington County, State of Arkansas;
8. Possession of Controlled Substance- Marijuana (Count Four), Case No. 72CR-23-321, in the District Court of Washington County, State of Arkansas; and
9. Possession of Marijuana with Intent to Distribute, Case No. CF-2023-0082, in the District Court of Delaware County, State of Oklahoma,

willfully received a firearm, that is, a Romarm/Cugir, Micro Draco, 7.62 x 39mm pistol, serial number PMD-18291-20, which had been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

COUNT SEVEN
[18 U.S.C. §§ 922(n) and 924(a)(1)(D)]

From on or about September 15, 2023, through on or about September 16, 2023, in the Northern District of Oklahoma, the defendant, **LUIS ANTONIO SORIA**, a/k/a “Sosa,” knowing he was then under indictment for the following crime punishable by imprisonment for a term exceeding one year:

Possession of Schedule II Controlled Substance, Case No. 72CR-23-75, in the District Court in and for Washington County, Arkansas, willfully transported in interstate commerce a firearm, that is, a Glock, Model 19, 19 x 9mm pistol, serial number BTWU743.

All in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

COUNT EIGHT
[18 U.S.C. §§ 922(n) and 924(a)(1)(D)]

From on or about September 15, 2023, through on or about September 16, 2023, in the Northern District of Oklahoma, the defendant, **DARMEL DASHUN BATEMON, JR.**, a/k/a “Darmel Bateman,” knowing he was then under indictment for the following crimes punishable by imprisonment for terms exceeding one year:

Manslaughter, Case No. 60CR-23-3725, in the District Court in and for Pulaski County, State of Arkansas,

willfully transported in interstate commerce the following firearms:

1. A Palmetto State Armory, Model PA-15, Multi caliber pistol, serial number SCD443583;
2. An Anderson Manufacturing, Model AM-15, Multi caliber pistol, serial number 22021725;
3. A Century Arms International, Model VSKA, 7.62 x 39mm pistol, serial number SV7P011101;
4. A Zastava, Model PAP M85 PV, 5.56 caliber pistol, serial number M85PV001787; and
5. A Romarm/Cugir, Micro Draco, 7.62 x 39mm pistol, serial number 22PMD-28632.

All in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

COUNT NINE
[18 U.S.C. §§ 922(g)(1) and 924(a)(8)]

On or about September 16, 2023, in the Northern District of Oklahoma, the defendant, **MARCOS ZAMBRANO-RIVERA JR.**, a/k/a “Grifo,” a/k/a “Marcos Junior Zambrano-Rivera” knowing he had previously been convicted of the following crime punishable by imprisonment for a term exceeding one year:

Possession with Purpose to Deliver Controlled Substance, Case No. 72CR-22-15, in the District Court of Washington County, State of Arkansas, on September 28, 2022,

knowingly possessed in and affecting interstate commerce the following firearms and ammunition:

1. A Walther, IWI Uzi, .22 caliber rifle, serial number WI018714;
2. Assorted rounds of ammunition.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT TEN
[18 U.S.C. §§ 922(g)(1) and 924(a)(8)]

On or about September 16, 2023, in the Northern District of Oklahoma, the defendant, **KALOB NATHANIEL BURTON**, knowing he had previously been convicted of the following crimes punishable by imprisonment for terms exceeding one year:

1. Possession with Purpose to Deliver Controlled Substance (Count One), Case No. 60CR-22-1454, in the District Court of Pulaski County, State of Arkansas, on August 04, 2022; and
2. Theft by Receiving- Firearm (Count Two), Case No. 60CR-22-1454, in the District Court of Pulaski County, State of Arkansas, on August 04, 2022,

knowingly possessed in and affecting interstate commerce the following firearms and ammunition:

1. A Palmetto State Armory, Model PA-15, Multi caliber pistol, serial number SCD443583;
2. An Anderson Manufacturing, Model AM-15, Multi caliber pistol, serial number 22021725;
3. A Century Arms International, Model VSKA, 7.62 x 39mm pistol, serial number SV7P011101;
4. A Zastava, Model PAP M85 PV, 5.56 caliber pistol, serial number M85PV001787; and
5. A Romarm/Cugir, Micro Draco, 7.62 x 39mm pistol, serial number 22PMD-28632.
6. Assorted rounds of ammunition.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT ELEVEN
[18 U.S.C. § 1952(a)(2)]

From on or about September 15, 2023, through on or about September 16, 2023, in the Northern District of Oklahoma and elsewhere, the defendants, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” **LUIS ANOTONIO SORIA**, a/k/a “Sosa,” **BRYAN ULYSSES MARTINEZ**, a/k/a “Poloh,” **DARMEL DASHUN BATEMON, JR.**, a/k/a “Darmel Bateman,” **MARCOS ZAMBRANO-RIVERA JR.**, a/k/a “Grifo,” a/k/a “Marcos Junior Zambrano-Rivera,” **KALOB NATHANIEL BURTON**, **CHRISTOPHER YAHIR MARTINEZ**, a/k/a “Migo,” and **CHRISTOPHER SABB**, a/k/a “Pressure,” a/k/a “Pressure Pack,” traveled in interstate commerce and used any facility in interstate commerce, with the intent to commit a crime of violence to further an unlawful activity, that is, a business enterprise involving narcotics and controlled substances, and thereafter attempted to commit the crime of violence to further such unlawful activity.

All in violation of Title 18, United States Code, Section 1952(a)(2).

FORFEITURE ALLEGATION

**[18 U.S.C. §§ 924(d)(1), 934(a)(1)(A) and 981(a)(1)(C), 26 U.S.C. § 5872,
and 28 U.S.C. § 2461(c)]**

The allegations contained in this Second Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), Title 18, United States Code, Section 934(a)(1)(A), Title 18, United States Code, Section 981(a)(1)(C), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in this Second Superseding Indictment, as a part of their sentences, the defendants, **LUIS GERARDO TREJO-ZAMBRANO**, a/k/a “Goon,” **LUIS ANTONIO SORIA**, a/k/a “Sosa,” **BRYAN ULYSSES MARTINEZ**, a/k/a “Poloh,” **DARMEL DASHUN BATEMON, JR.**, **MARCOS ZAMBRANO-RIVERA JR.**, a/k/a “Grifo,” a/k/a “Marcos Junior Zambrano-Rivera,” and **KALOB NATHANIEL BURTON**, and **CHRISTOPHER YAHIR MARTINEZ**, a/k/a “Migo,” and **CHRISTOPHER SABB**, a/k/a “Pressure,” a/k/a “Pressure Pack,” shall forfeit to the United States any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations, any firearm and ammunition involved in or used in the knowing commission of such offenses, and any property, real or personal, that was used or intended to be used to commit or to facilitate the violation of federal law. The property to be forfeited includes, but is not limited to:

FIREARMS AND AMMUNITION

1. A Palmetto State Armory, Dagger Compact, 19 x 9mm pistol, serial number JJE37863;
2. A Romarm/Cugir, Micro Draco, 7.62 x 39mm pistol, serial number PMD-18291-20;
3. A Walther, IWI Uzi, .22 caliber rifle, serial number WI018714;
4. A Glock, Model 19, 9 x 19mm caliber pistol, serial number BTWU743;
5. A Glock, Model 27 Gen 4, .40 caliber pistol, serial number XRG993;
6. A Palmetto State Armory, Model PA-15, multi caliber pistol, serial number SCD443583
7. An Anderson Manufacturing, Model AM-15, Multi caliber pistol, serial number 22021725;
8. A Century Arms International, Model VSKA, 7.62 x 39mm pistol, serial number SV7P011101;
9. A Zastava, Model PAP M85 PV, 5.56 caliber pistol, serial number M85PV001787;
10. A Romarm/Cugir, Micro Draco, 7.62 x 39mm pistol, serial number 22PMD-28632;
11. Any ammunition or magazines not specified; and

CURRENCY

12. Approximately \$3,549 in United States currency.

All pursuant to Title 18, United States Code, Section 924(d)(1), Title 18, United States Code, Section 934(a)(1)(A), Title 18, United States Code, Section 981(a)(1)(C), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

CLINTON J. JOHNSON
United States Attorney

A TRUE BILL



KENNETH ELMORE
Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson